



**Response to the
Australian Communications and Media
Authority's review of the Children's
Television Standards 2008**

**Submission from the NSW Centre for Overweight and
Obesity and the Australian Centre for Health Promotion
University of Sydney**

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The University of Sydney

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A list of research publications related to food marketing to children produced by this group is provided in Attachment A.

TABLE OF CONTENTS

EXECUTIVE SUMMARY	4
INTRODUCTION	6
RESPONSES TO THE ACMA REVIEW OF THE CTS	7
1. Scientific evidence on the effects of food advertising.....	7
2. Food profiling.....	11
3. Costs versus harms	12
4. Viewing times when regulations apply.....	14
5. Monitoring and enforcement systems	16
CONCLUSION.....	17
REFERENCES	18
<u>ATTACHMENT A Related research publications.....</u>	<u>19</u>

EXECUTIVE SUMMARY

The NSW Centre for Overweight and Obesity (COO) and the Australian Centre for Health Promotion (ACHP) welcome the opportunity to respond to the Report of the Review of the Children's Television Standards 2005 that was released August 2008. Unfortunately, in its draft proposal for revisions to the CTS, ACMA has not completely fulfilled its responsibilities or adequately taken account of the scientific evidence regarding food marketing to children.

- ACMA has not fully responded to two principles intended to guide its operations: protecting children from harm; and respect community standards.
- The evidence base used by ACMA lacks scientific rigour, credibility and currency.
- While ACMA commissioned some research to inform decision-making, no health experts were consulted regarding the literature review on television advertising to children or to assess the health impacts of food marketing to children. ACMA has not adequately taken account of the complex causal web of influences linking food marketing and obesity, but rather adopted an overly simple linear model to use to examine the evidence.
- ACMA failed to consider the applicability of the FSANZS food profiling system (that is under development) to food advertising, despite the fact that Ofcom has successfully used a very similar system.
- Despite assembling excellent data on children's viewing patterns, ACMA has not used this data to recognise that any regulations regarding advertising to children should not be limited to C and P programming times, but should be implemented throughout peak children's viewing times.
- ACMA has not addressed the inadequacy of current monitoring and enforcement systems for dealing with CTS breaches.

RECOMMENDATIONS:

1. We recommend ACMA revise its position and recognize the accumulating body of evidence indicating that food advertising does influence children's food preferences and consumption, and that this in turn

increases the risk of a range of poor nutritional outcomes, including increased levels of overweight and obesity.

2. We recommend that the nutrient profiling scheme currently under development by FSANZ be considered and tested for appropriateness as a means of classifying food advertisements.
3. ACMA revise its analysis of costs and harms, taking account of the evidence from banning tobacco advertisements and the relatively small costs per child that would be incurred.
4. We recommend that all CTS provisions relating to advertising be amended to apply throughout peak children's viewing times rather than scheduled children's programming.
5. We strongly recommend that the CTS be revised to ensure greater clarity to promote consumer awareness and support parents, as well as more efficient and effective monitoring and enforcement.

INTRODUCTION

The NSW Centre for Overweight and Obesity and the Australian Centre for Health Promotion welcome the opportunity to respond to the Report of the Review of the Children's Television Standards 2005 that was released August 2008.

Before responding to specific proposed changes in the Children's Television Standards (CTS), we would like to express concern that ACMA has failed to follow two clear mandates. First, an objective of the Broadcasting Services Act is to ensure that *broadcasting service providers place a high priority on protecting children from exposure to program material that may be harmful to them, including advertising and sponsorship matter*. ACMA has a duty to protect children from *possible harmful effects from television*. In line with this objective, we urge ACMA to bear in mind its duty of care when reconsidering its position on unhealthy food advertising to children.

As an instrument of government, ACMA has a responsibility to closely address its guiding principles and take account of government-based health recommendations, including nutrition guidelines and reports, such a that by the National Preventative Health Taskforce. (1) We reiterate that exposure to food advertising has a clear potential for harmful effects in children from over-consumption to overweight and obesity. We strongly recommend that ACMA revise the CTS so that children are protected from the potentially harmful effects of food advertising on children's health and well-being.

Second, ACMA is required to encourage broadcasters to respect community standards in the provision of program material. ACMA believes that it has been attentive to prevailing community standards and expectations. However it appears that ACMA has ignored growing community concerns about food marketing to children on television.

- In an Australia-wide survey of parents of children aged less than 14 years old, 67% of parents were concerned about unhealthy food advertising to children, 80% were concerned about the volume of advertising to children, 93% supported a change from industry self-regulation and 87% supported a ban on unhealthy food advertising to children. (2)

- o ACMA received 20,521 postcards from the *Pull the Plug* community campaign urging them to ban unhealthy food advertising during the times when children are watching television.

We strongly urge ACMA to hear the concerns of the community and reconsider its decision not to limit advertising of unhealthy foods to children when they are watching television.

RESPONSES TO THE ACMA REVIEW OF THE CTS

ACMA has proposed several changes to the CTS, as well as deciding to leave other aspects unchanged. The following section details our responses to those items.

1. **Scientific evidence on the effects of food advertising**

ACMA has indicated that it will not introduce restrictions on food and beverage advertising. Based on the current evidence available, ACMA sees that the association between food advertising and obesity is modest, and that there is little research on the benefits of banning food advertising. They concluded that there is no evidence of a direct causal relationship between exposure to food advertising and obesity. ACMA does not support a ban of unhealthy food advertising. ACMA would consider reviewing its position when more and stronger evidence is available on the association between food advertising and obesity and the effects of banning food advertising.

RESPONSE:

The evidence base used by ACMA lacks scientific rigour, credibility and currency.

1.1 ACMA claims that it has taken an evidence-based approach to consider the issue of food and beverage advertising to children. ACMA has based its decision regarding food and beverage advertising on the findings from the Brand literature review on television advertising to children. However, the Brand review has methodological limitations that reduce the strength of its conclusions. Although Brand and colleagues examined a large number of sources found from searches on five databases and numerous journals covering multiple disciplines, they have not described

clearly what the search terms used were, nor have they provided the criteria by which sources were included or omitted from the literature review. This is important, because key health and nutrition research sources and studies have been excluded. For example, the Brand literature review overlooked several key sources of medical and public health evidence. The reviewers did not search major medical and public health databases (e.g., Medline, PubMed) or key journals from overseas and Australia (e.g., British Medical Journal, Medical Journal of Australia, Appetite). Thus not all relevant scientific information on factors influencing food consumption and related health issues has been considered. Therefore, the evidence base used by ACMA lacks scientific rigour and credibility.

- 1.2 Furthermore, ACMA acknowledges that it is not a health advisory body and does not have internal expertise to advise on health matters; however, it did not seek input or respond to information provided by medical or public health experts. ACMA has also failed to take into account the recommendations of other government bodies with health expertise. For example, the National Preventative Health Taskforce published a technical report on obesity in Australia and recommended that measures be taken to *curb inappropriate advertising and promotion, including consideration of banning advertising of energy-dense, nutrient-poor foods on free-to-air television during children's television viewing hours.* (1)
- 1.3 The Departments of Health of Queensland and South Australia have acknowledged that there is sufficient evidence that food and beverage advertising on television influence children's food attitudes, choice and consumption and they are now taking action to address the issue and deal with community concerns. (3, 4) Both these State governments are currently conducting consultations and seeking opinions and proposals from industries, experts, community groups and members of the public regarding the influence of television advertising on children's health.
- 1.4 While ACMA commissioned some research to inform decision-making, no health experts were consulted in regard to the literature review on the health effects of television food advertising to children. The Brand literature review was carried out by experts in media, communications and education. As far as we can tell, there were no medical or public health experts consulted for the review. The lack of medical or public health expert involvement in the literature review also limits the strength

of the reviewers' conclusions regarding the effect of exposure to advertising on children's health. **The lack of expert medical and public health input led to the omission of information sources and erroneous interpretation of evidence.**

1.5 The evidence base that children's food-related awareness and behaviours are associated with exposure to television commercials continues to grow.

ACMA does states that it will review its position when more and stronger evidence is available regarding the effects of exposure to television advertising on children. In fact, since the Brand review, which examined literature published up until November 2006, more research has been published.

- In a Dutch study, Buijzen et al 2008 found that exposure to food advertising in children aged 4 to 12 years old was positively associated with their consumption of advertised brands and also with consumption of energy-dense products. This study showed that food advertising is likely to affect children's brand choice as well as their consumption of other energy-dense foods. (5)
- In a US study of third and fourth grade children's awareness of beer advertising, Collins et al 2005 found that although advertisements may not deliberately target children and youth, some advertisements may lead to high product awareness in children and youth. In this study, researchers found high levels of awareness for a beer commercial featuring an animated animal amongst third and fourth graders. (6)
- In an Australian study of fifth and sixth grade children, Dixon et al 2007 found television exposure was positively associated with more positive attitudes towards unhealthy food, the perception that other children ate more unhealthy food, and higher self-reported frequency of consumption of unhealthy food among children. (7)

Evidence is also accumulating indicating that the relationship between food marketing and dietary behaviours is in fact causal.

- Halford et al 2007 provides experimental evidence demonstrating that advertising affects children's food behaviours. The researchers exposed 5 to 7 year old children to food and non-food advertisements and found that children's consumption of sweet and savoury, and high and low-fat foods (except fruit) increased significantly after watching food advertisements. The foods were presented to children with their packaging removed, and this experiment further demonstrates how the effect of food advertising on children's food consumption may go beyond the brands advertised. (8) This replicates earlier research by Halford et al 2004, which found that exposure to food advertisements increased 9 to 11 year olds' consumption of most but not all food types. Halford et al 2004 further found that the ability to recognise food commercials correctly was associated with higher food intake post food advert exposure. Obese children recognized a greater number of food commercials than normal weight children. (9)
- Dixon et al 2007 found that showing children only healthy food advertisements or unhealthy food advertisements had little effect on their attitudes towards vegetables, but showing children a combination of unhealthy food and health food advertisements had a negative impact on their attitudes towards vegetables. When children were exposed to healthy food advertisements, some attitudes towards healthy foods improved, regardless of whether the advertisements were shown with or without unhealthy food advertisements. Increasing healthy food commercials on television may promote the attractiveness of these foods to children. This suggests that changing the food advertising environment on children's television to increase the representation of healthy food commercials may help normalise and reinforce healthy eating. (7)

1.6 ACMA has adopted a limited and erroneous approach to interpret how TV food advertising might influence health.

ACMA has interpreted the potential harm arising from food advertising solely in terms of whether there is a direct causal link between food advertising and obesity. In fact, the key health-related harm that follows from advertising of unhealthy foods is the over-consumption of those foods. To address this question, ACMA needs to consider evidence on food consumption patterns and how these are influenced by advertising

exposures; this was not covered in the Brand review. The harm that results from over-consumption of unhealthy foods includes excess energy intake, as well as dental caries, inadequate nutritional intake, and risk of high blood pressure and fatty liver disease. While overweight and obesity are potential consequences of the over-consumption of unhealthy foods; they are indirect effects of food advertising. The approach adopted by ACMA is not informed by the well established publications and analyses describing the complex causal pathways producing overweight and obesity at population levels that have been published by WHO and the UK Foresight Program. (10, 11)

RECOMMENDATION:

We recommend ACMA revise its position and recognize the accumulating body of evidence indicating that food advertising does influence children's food preferences and consumption, and that this in turn increases the risk of a range of poor nutritional outcomes, including increased levels of overweight and obesity.

2. Food profiling

ACMA states that currently there is no standard tool for identifying high fat, salt, sugar content foods. Thus, ACMA has decided not to implement restrictions on food and beverage advertising, as it considers that this would constitute a blunt form of regulatory intervention. ACMA would reconsider its position when a food identification standard appropriate to the Australian market is successfully introduced.

RESPONSE:

ACMA has not considered the FSANZS food profiling system.

2.1. The Food Standards Australia New Zealand Agency (FSANZ) is currently developing a nutrient profiling scheme for determining if a food product is eligible to make a health claim based on its nutrient profile. There is the potential for food advertisements to be classified based on such a nutrient profiling scheme, as has occurred in the UK by Ofcom. New Zealand researchers have demonstrated that such a nutrient profiling scheme could be easily applied to television commercials to identify high fat, salt, sugar content foods. (12) It would be necessary to

test the FSANZ nutrient profiling model once it has been finalised, in order to investigate of its applicability to the Australian television advertising environment as well as the sustainability of the scheme. Once again it is noteworthy that while ACMA commissioned some research to inform decision-making, it did not appear to specifically seek any information from FSANZ about the applicability of their nutrient profiling scheme.

RECOMMENDATION:

We recommend that the nutrient profiling scheme currently under development by FSANZ be considered and tested for appropriateness as a means of classifying food advertisements.

3. Costs versus harms

ACMA decided that restricting food beverage advertising would lead to significant negative impacts on industry in even the most limited circumstances. ACMA estimated that if minimal restrictions on advertising (e.g., banning all food and beverage advertisements during C and P program periods or 5 hours per week) were implemented, this would reduce broadcasters' profitability by an impact of 1-4%, approximately \$8.2-\$24.5 million per annum.

RESPONSE:

ACMA has made a value-based judgment that places the cost to industry above the harms to children and families.

3.1. ACMA quotes an estimate from Ofcom (UK) that television advertising or viewing accounted for about 2% of variation in food choice or obesity. Given that both food choice and obesity are influenced by multiple factors, reducing the impact of one variable by 2% would have potentially large effects at the population level.

In fact, using ACMA's own figures, the cost to industry of minimal restrictions on food advertising equates to only \$2-\$6 per child less than 15 years of age per annum¹. This is a low cost compared to the costs borne by

¹ According to the Australian Bureau of Statistics, there were four million children aged less than 15 years in Australia in June 2006, representing 19% of the total Australian population. (13)

families and taxpayers that result from the health burden associated with poor nutrition and obesity.

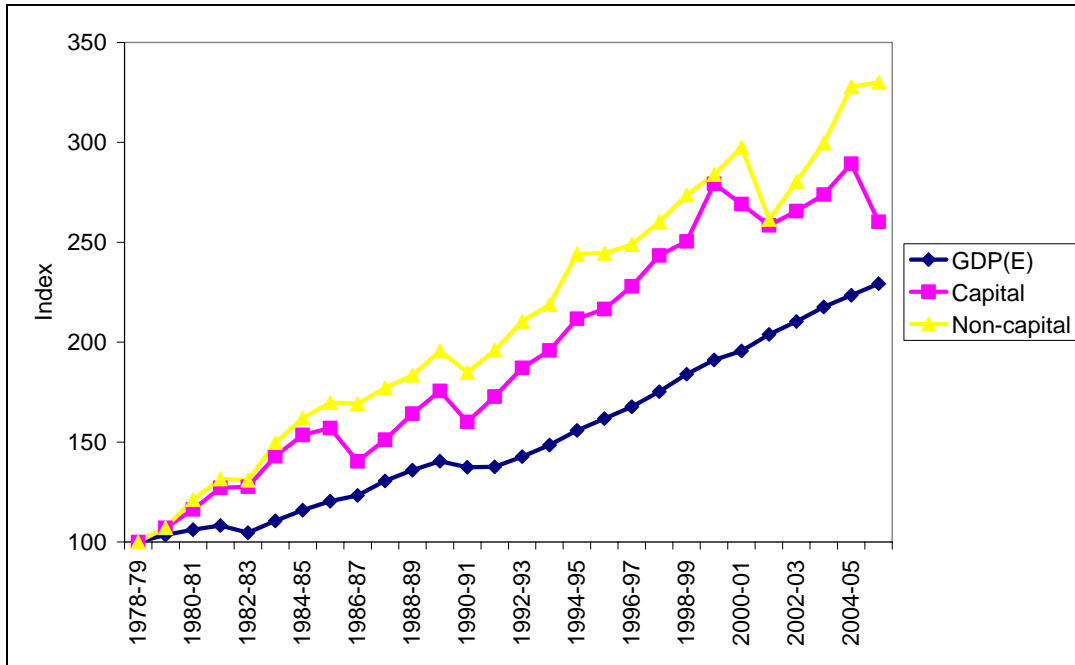
3.2. However, this cost is unlikely to eventuate. There is no evidence that the estimated costs to industry would apply, based on the experience in banning tobacco on Australian television and radio, implemented on 1 September 1976. In a report by Quit.org, data from the Australian Broadcasting Tribunal on total advertising revenue collections from radio and television between 1970 and 1980 were examined. The data showed that advertising revenue for both radio and television continued to increase following the ban on tobacco advertising (Table 1). (14) A more recent report by ACMA on trends in commercial television reports that commercial television revenue has displayed an upward trend since 1978-1979 (Figure 1). (15)

Table 1. Advertising revenue from Australian television and radio before and after the ban on tobacco advertising

Year	Television \$ '000			Radio \$ '000		
	Actual revenue	Inflation adjusted ♦	% change	Actual revenue	Inflation adjusted ♦	% change
1969/1970	91,192	385,380		37,059	56,600	
1970/1971	87,869	354,410	-8.0	39,481	159,240	1.7
1971/1972	92,040	347,600	-1.9	43,630	164,770	3.5
1972/1973	105,389	375,270	8.0	46,696	166,270	1.0
1973/1974	118,381	373,200	-0.6	53,494	168,640	1.4
1974/1975	136,816	369,100	-1.1	59,017	159,430	-5.5
1975/1976	195,916	468,450	26.9	74,378	177,840	11.2
1976/1977	257,049	539,860	15.2	92,884	195,070	9.7
1977/1978	303,929	582,740	7.9	107,688	206,470	5.8
1978/1979	366,909	650,260	11.5	121,476	215,140	4.2
1979/1980	428,238	689,200	6.0	134,253	216,060	0.4

♦ Actual revenue has been adjusted to allow for inflation, rounded to the nearest \$1,000 and is expressed at constant 1985 prices.
Source: Australian Broadcasting Tribunal.

Figure 1: Index of real growth in GDP(E) and commercial television revenues by region (1978–79=100)²



Source: ACMA (2008). Commercial Industry Financial Trends 1978-1979 to 2005-2006

RECOMMENDATION:

ACMA revise its analysis of costs and harms, taking account of the evidence from banning tobacco advertisements and the relatively small costs per child that would be incurred.

4. Viewing times when regulations apply

ACMA has decided to maintain the existing commencement time of the C band on weekday afternoons, and to extend the morning C band to 8.30am on weekdays. There will be no changes to the current P time bands.

RESPONSE:

Advertising regulations should not be limited to C and P programming times.

4.1. The current and proposed CTS regulate advertising broadcast immediately before, during and after C programming, and prohibit

² Data converted using the non-farm GDP implicit price deflator. GDP(E) and non-farm implicit price deflator both sourced from ABS 2007, *Australian System of National Accounts*, <<http://www.abs.gov.au/AUSSTATS/abs@.nsf/DetailsPage/5204.02006-07?OpenDocument>>, accessed 10 August 2007.

advertising during P programming, within designated C time bands (7-8.30am and 4-8:30pm weekdays; 7am-8:30pm weekends and holidays) and P time bands (7am-4:30pm). Advertisements broadcast during a C time band but not immediately before, during or after a C program are not subject to the existing or proposed CTS.

It is inappropriate to link advertising regulations to the timing of C and P programming because these periods are not the times when large numbers of children actually watch television, as indicated by OzTAM television audience data obtained by ACMA for this review. Child audience numbers (0-14 years) are relatively low during C and P programming (usually broadcast between 4-4.30pm on weekdays, and on weekend mornings), and are highest between 7-9pm. (16) Therefore, the proposed C and P time bands, which end at 8.30pm and 4.30pm respectively, do not sufficiently cover peak children's viewing times and any regulations on advertising to children would be severely limited in their impact.

RECOMMENDATION:

We recommend that all CTS provisions relating to advertising be amended to apply throughout peak children's viewing times rather than scheduled children's programming. These peak children's viewing times should be determined using current and independently-gathered data on children's actual viewing habits. Advertising throughout these time periods, regardless of programming material, should be subject to the revised CTS.

Based on OzTAM audience viewing data obtained by ACMA for this review, (16) we recommend that advertising restrictions under the CTS be in place during the following time periods: **7-9am and 4-9pm weekdays; 7am-9pm weekends.**

5. **Monitoring and enforcement systems**

ACMA has proposed no changes to the monitoring and enforcement of television advertising through the CTS.

RESPONSE:

Current monitoring and enforcement systems are inadequate for dealing with CTS breaches.

- 5.1. Our research has identified loopholes in specific provisions within the CTS that are easily manipulated and/or circumvented due to excessively broad restrictions and/or ambiguous terminology. (17)

- 5.2. The current system of relying on the public to lodge a complaint before a breach of the standards is addressed is inappropriate, reactive and complex. Members of the public have not been provided with sufficient information to have an adequate understanding of the CTS and the complaints process (including the fact that they need to lodge a complaint for food advertising to be controlled) and do not necessarily have the time to lodge complaints. In addition, with no published information available on successful complaints regarding breaches of the CTS since their inception in 1990 (17), the public is unlikely to feel empowered by their ability to be involved in the enforcement process.

RECOMMENDATION:

We strongly recommend that the CTS be revised to ensure greater clarity to promote consumer awareness and support parents, as well as more efficient and effective monitoring and enforcement.

We recommend that the CTS be monitored by an independent statutory body, which has the ability to act as a consumer watchdog with the full law enforcement powers of a government body, but acting independently of both government and industry. An example is the Australian Competition and Consumer Commission (ACCC). The monitoring body should enforce clear and transparent monitoring and enforcement systems, and information regarding this and recognized breaches should be made readily available to the public, both directly and through annual reporting to Parliament.

Clear, easy-to-understand information regarding the CTS and opportunities for lodging complaints should be made readily available to the public. Possible dissemination tools include public service broadcast announcements, information sheets, posters, and fridge magnets displaying website and contact information.

Breaches of the CTS should be investigated immediately following identification by the monitoring body and appropriate strict penalties implemented. Information on breaches of the CTS should be made readily available to the public immediately following decision.

CONCLUSION

The NSW Centre for Overweight and Obesity and the Australian Centre for Health Promotion reiterates its concern that ACMA has failed in its duty to protect children from the possible harmful effects of television and in its responsibility to heed community concerns about advertising unhealthy foods and beverages to children. We strongly urge ACMA to hear the concerns of the community and reconsider its decision not to limit advertising of unhealthy foods to children when they are watching television.

We have responded in detail to ACMA's review of the CTS, the proposed changes as well as the lack of changes. We have provided evidence of the negative effects of food advertising to children, information about a nutrient profiling tool being developed by FSANZ, and data showing that the costs of banning food adverts to children are likely to be smaller than has been estimated by ACMA. Thus, further restrictions on food advertising to children on television are supported by research, a nutrient profiling tool and additional cost-harm data.

Moreover, there is excellent data available on children's television viewing patterns, which clearly indicate that children are watching television outside of C and P programming times. Therefore, regulations regarding advertising to children should not be limited to C and P programming times, but should be implemented throughout children's television viewing times. Regulations should be complemented by an effective monitoring and enforcement system for dealing with CTS breaches.

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ATTACHMENT A

COO and ACHP Research publications related to food marketing

Kelly B, Hattersley L, King L, Flood V. Persuasive food marketing to children: use of cartoons and competitions in Australian commercial television advertisements. *Health Promotion International* 2008, Advance access published on August 28, 2008; doi: doi:10.1093/heapro/dan023

Morley B, Chapman K, Mehta K, King L, Swinburn B, Wakefield M. Parental awareness and attitudes about food advertising to children on Australian television. **ANZJPH** 2008, 32(4): 341- 347.

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Kelly B, Smith B, King L, Flood V, Bauman A. (2007) Television food advertising to children: the extent and nature of exposure. *Public Health Nutrition*, **10(11)**: 1234-1240.

Chapman K, Kelly B, King L, Flood V. (2007) Fat chance for Mr Vegie TV ads. *Med J Aust*, **31(2)**: 190.

Kelly B, King L, Bauman A, Smith BJ, Flood V. (2007) The effects of different regulation systems on television food advertising to children. *Aust NZ J Public Health*, **31(4)**: 340-343